

July 16, 2014

Honorable Martha Coakley  
Attorney General of Massachusetts  
**Attn: Antitrust Division**  
Office of Attorney General  
One Ashburton Place, 18th Floor  
Boston, MA 02108

Dear Madame Attorney General:

We are writing with regard to your recent agreement with Partners HealthCare.

The Massachusetts League of Community Health Centers and several of its members have longstanding relationships with Partners HealthCare (Partners). These relationships are primarily based on care delivery, workforce development initiatives, and the implementation of Partners' statewide Community Benefits programs. It is within this context that we submit these comments for your consideration as you work to finalize your review of the pending transactions between Partners and South Shore Hospital and Hallmark Health System.

As rapid change continues to shape Massachusetts' health care delivery system, your oversight in monitoring marketplace developments and compliance will be critical in protecting the well-being of our Commonwealth's residents. The lengthy and transparent process undertaken by your office to secure sound commitments from Partners in the areas of pricing, contracting, and growth demonstrate that you have acted in the public interest.

The Primary Care Medical Home provides the foundation for the integrated health care delivery system envisioned and mandated by Chapter 224 and the federal Affordable Care Act. Focused on managing the totality of a patient's health needs over the continuum of primary, specialty, and tertiary care, this approach ultimately relies on both the accessibility and coordination of care -- all in the pursuit of improving patient health while reducing health care costs.

Health centers remain a core part of this strategy, managing patient care in community settings and coordinating with more intensive service providers when needed. Partners' stated intention to advance their work in Population Health Management to serve entire populations of patients, and to ensure pathways to care for those patients, is both aligned with state health reform goals and consistent with the System's long-term support of community-based health care across Massachusetts.

*Good health. Right around the corner.*

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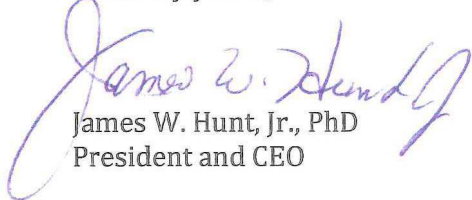
In addition to their Community Benefits programs, Partners has provided a range of support to health centers regardless of geography or affiliation:

- Support for physician and nurse practitioner loan repayment at community health centers
- Process improvement grants to enhance operational efficiencies at health centers
- Investments in health center programs, technology upgrades, and facility improvements
- Funding for innovative projects spearheaded by health center clinician-leaders to implement new patient care strategies that can be shared across the community health center network
- Sponsorship of the League's AmeriCorps HealthCorps program which recruits young adults to volunteer service at health centers
- Launch of the *Kraft Center for Community Health* to attract, strengthen, and retain physicians and nurse practitioners dedicated to community health

Community health centers remain steadfast in their mission to not only offer their patients outstanding primary care, but to also provide them access to the best available behavioral health, rehabilitation, and other specialty services irrespective of their insurance status or where they live. Our experience in working closely with Partners over 20 years indicates that their leadership and institutions share these values in both principle and practice.

Thank you for this opportunity to comment and please do not hesitate to contact myself or our members for more information. We appreciate your diligence in these transactions and longstanding service to the Commonwealth.

Sincerely yours,



James W. Hunt, Jr., PhD  
President and CEO

cc: Antonia McGuire, Chair  
MLCHC Board